

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS (LULAC), a nonprofit Latino
Civil rights organization; CRISTINA ACOSTA;
IVAN CASTILLO; ANTHONY RIOS; and
IVAN SANCHEZ,
Plaintiffs,

V.

THE CITY OF HOUSTON; and PAT J. DANIEL, in her official capacity as City Secretary for the City of Houston
Defendants.

S

Civil Action No. 4:22-cv-04199

JOINT MOTION FOR CONTINUANCE OF SCHEDULING CONFERENCE

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiffs League of United Latin American Citizens (“LULAC”), Cristina Acosta, Ivan Castillo, Anthony Rios, and Ivan Sanchez (collectively, the “Plaintiffs”), and Defendants City of Houston (the “City”) and Pat J. Daniel, in her official capacity as the City Secretary for the City of Houston (collectively, the “Defendants”), file their Joint Motion for Continuance of Scheduling Conference, and in support would show the Court the following:

1. The Scheduling Conference in this case is currently set for April 21, 2023.
2. The parties have been working on the Joint Case Management Discovery Plan in this matter. As the Court is aware, this is a case brought under Section 2 of the Voting Rights Act, which is currently being considered by the United States Supreme Court in *Allen v. Milligan* (or *Allen v. Caster*). The case was argued to the Supreme Court in October 2022, and the parties expect a decision by the end of the current term (probably early July 2023).
3. The attorneys in this case all agree that the *Allen* decision could have a major impact on the issues in this case, including which legal issues are still viable and thus what discovery would need to be done. To save resources for all parties and the Court, the parties believe that it would be

beneficial to postpone the scheduling conference scheduled for April 21, 2023 for roughly 90 days, to the last two weeks of July, so that all the parties may receive and review the Supreme Court's decision in *Allen*, and then decide what needs to be done in this case.

4. To that end, the parties respectfully request that the Scheduling Conference in this matter be postponed until the last two weeks of July, 2023, and that all related deadlines be reset accordingly.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants request that the Scheduling Conference in this matter currently set for April 21, 2023, be rescheduled to the last two weeks of July, 2023, and that all related deadlines be reset accordingly.

By: /s/ Martin Golando¹
State Bar No. 07731950
LAW OFFICE OF JOSE GARZA
7414 Robin Rest Dr.
San Antonio, Texas 78209

The Law Office of Martin Golando, PLLC
Texas Bar No. 24059153
2326 W. Magnolia
San Antonio, Texas 78201
Office: (210) 471-1185
Email: martin.golando@gmail.com

ATTORNEYS FOR PLAINTIFFS

THOMPSON & HORTON LLP

By: /s/ Christopher B. Gilbert
Lisa R. McBride
State Bar No. 24026829
lmcbride@thompsonhorton.com
Christopher B. Gilbert
State Bar No. 00787535
cgilbert@thompsonhorton.com

¹ By permission. /s/ Christopher B. Gilbert

Stephanie A. Hamm
State Bar No. 24069841
shamm@thompsonhorton.com
Celena M. Vinson
State Bar No. 24037651
cvinson@thompsonhorton.com

3200 Southwest Freeway, Suite 2000
Houston, Texas 77027
Telephone: (713) 554-6714
Facsimile: (713) 583-9611

ATTORNEYS FOR DEFENDANTS

OF COUNSEL:

Edgardo E. Colón
State Bar No. 04626445
Edgar.c@westllp.com
West & Associates, L.L.P.
4601 Washington Ave., Suite 200
Houston, Texas 77007
Telephone: (713) 520-1064
Facsimile: (713) 955-5030
Craig Capua
State Bar No. 03783950
Craig.c@westllp.com
Louis A. Bedford, IV
State Bar No. 24109630
Louis.b@westllp.com
Telephone: (214) 941-1881
Facsimile: (214) 941-1399

Suzanne R. Chauvin
Chief, General Litigation Section
Southern District Bar No. 14512
Texas State Bar No. 04160600
City of Houston Legal Department
P.O. Box 368
Houston, Texas 77001-368
900 Bagby, 4th Floor
Houston, Texas 77002
Telephone: 832.393.6219
Fax: 832.393.6259
suzanne.chauvin@houstontx.gov

CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2023, a true and correct copy of the foregoing document was served on all counsel and pro se parties of record via the Court's CM/ECF system, as follows:

Jose Garza
LAW OFFICE OF JOSE GARZA
7414 Robin Rest Drive
San Antonio, Texas 78209

Martin Golando
The Law Office of Martin Golando, PLLC
2326 W. Magnolia
San Antonio, Texas 78201

By: /s/ Christopher B. Gilbert
Christopher B. Gilbert